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September 26, 2003

Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

FILED²

SEP 30 2003

**Missouri Public
Service Commission**

Re: The Staff of the Missouri Public Service Commission
v. BarTel Communications, Inc.
Case No. TC-2004-0127
Motion for Admission Pro Hac Vice
Request for Mediation

Dear Secretary,

Enclosed for filing with the Commission, please find the original and nine copies of the above-referenced pleadings in this case. Please return one copy of each pleading "filed" stamped in the enclosed, self-addressed and stamped envelope.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Richard W. Hird

Before The Public Service Commission
Of the State of Missouri

FILED²

SEP 30 2003

Missouri Public
Service Commission

The Staff of the Missouri Public Service)
Commission,)
Complainant,)
v.)
BarTel Communications, Inc.,)
Respondent.)

Case No. TC-2004-0127

Motion for Admission Pro Hac Vice

COMES NOW, Richard W. Hird (Movant), President and General Counsel of the Respondent, BarTel Communications, Inc. (BTC), and in accordance with the rules of the Missouri Public Service Commission (Commission), moves for admission to practice before the Commission for the limited purpose of requesting mediation of, and responding to, the above-captioned complaint filed by the Staff of the Missouri Public Service Commission (Staff). In support thereof, Movant states as follows:

1. Movant is admitted to practice before the U.S. Supreme Court (1997), the Tenth U.S. Circuit Court of Appeals (1982), the U.S. District Court for the District of Kansas (1982) and the Supreme Court of the State of Kansas (1982). Movant has previously appeared before this Commission on behalf of BTC.
2. Neither the Movant, nor any member of his firm, is or has ever been, disqualified from appearing before any of the courts listed in paragraph 1, above.
3. Movant is President and General Counsel of, BTC.

4. Movant seeks admission to practice before the Commission for very limited purposes, including (1) mediation of the complaint filed by Staff in the above-referenced matter; and (2) satisfying the obligations to the Commission in properly terminating the certification of BTC as a competitive local exchange carrier within the State of Missouri and winding up the corporate existence of BTC.
5. BTC became insolvent and closed its operations in the State of Missouri on December 31, 2002. BTC has not conducted any business in the State of Missouri since December 31, 2002.
6. Movant believes the issues raised in the Complaint filed by Staff can be easily resolved through mediation. However, BTC is insolvent and does not have the resources to retain local counsel, as required by 4CSR 240-2.040 (3)(C)2 and 3. Therefore, Movant requests permission of the Commission to appear in this matter without designating local counsel, as required by 4CSR 240-2.040 (3)(C)2 and 3.

WHEREFORE, Movant respectfully requests an order of the Commission allowing Richard W. Hird to enter his appearance in this matter for the limited purposes described above, and for such other and further relief as the Commission may deem appropriate.



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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion Request for Mediation was mailed by First Class U.S. mail, postage prepaid, and correctly addressed to the following person(s) on the 26th day of September, 2003:

Dana K. Joyce, General Counsel
Bruce H. Bates, Associate General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102



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